

COMMERCIAL TSD
OTHER TSD
LDR GENERATOR
OTHER GENERATOR
SUBSTITUTION

INSPECTION FORM

NEW YORK STATE INDUSTRIAL HAZARDOUS WASTE MANAGEMENT ACT
(Chapter 639, Laws of 1978)

Prepared for:

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Thomas C. Jorling, Commissioner

Send to: Division of Hazardous Substances Regulation
Compliance Inspection Section
50 Wolf Road - Room 208
Albany, New York 12233-7252

EPA I.D. NUMBER: NYD001229350

*HANDLER'S NAME (Corporate): NELSON GALVANIZING
(Division): _____

*HANDLER'S MAILING ADDRESS: 11-02 BROADWAY
LONG ISLAND CITY
City & State NY, Zip Code 11101

*HANDLER'S LOCATION ADDRESS: _____

(if different than mailing) _____

City & State _____, NY Zip Code _____

*HANDLER'S TELEPHONE NUMBER: (718) 728-0880 Extension _____

*FULL NAME OF HANDLER'S CONTACT: (Mr.) (Ms.) JOHN SWEENEY

*TITLE OF HANDLER'S CONTACT: PLANT MGR

INSPECTION DATE: 10/03/1989 TIME OF INSPECTION: 10:5 (a.m.) (p.m.)
COUNTY: QUEENS

INSPECTOR'S NAME: S. ARAKHAN
TITLE: ASST. ENGR.
NAME: _____
TITLE: _____

CHECK ONE: Copy of THIS report () has) (☒ has not) been given to the Handler.

REPORT PREPARED BY: _____

REPORT APPROVED BY: _____

DATE: _____

DATE: 10/11/89

340378



PART I

General Information and Classification of Facility

1. Identification of Hazardous Waste - 371

Yes

No

A. Is there reason to believe the facility has hazardous waste on-site? If yes, what leads you to believe it is hazardous waste? Check appropriate box/boxes and attach any applicable correspondence with DEC or EPA:

X

(1) X Company recognizes that its waste is hazardous during the inspection.

(2) X Company admitted the waste is hazardous in its RCRA notification and/or Part A permit application.

(3) X Testing has shown characteristics of:

() Ignitability - 371.3(b);

(X) Corrosivity - 371.3(c);

() Reactivity - 371.3(d);

(X) EP Toxicity - 371.3(e). D.O.E

— Has revealed hazardous constituents (please attach analysis report) 371.4(a)(2), Appendix 22, Appendix 23

(4) NA The material is listed in the regulations as a hazardous waste from non-specific sources 371.4(b).

(5) NA The waste is listed in the regulations as a hazardous waste from specific sources. 371.4(c).

(6) NA The material or product is listed in the regulations as discarded commercial chemical products, off-specification species, container residues and spill residues thereof. 371.4(d).

(7) NA Company is unsure, but has reason to believe that waste materials are hazardous. (Explain) _____

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- B. Is there reason, other than those above, for you to believe that there is hazardous waste on site? (Explain) NYC-DEP'S

INVESTIGATIONS HAS REVEALED CONTAMINATED
SOIL ON FACILITY'S PREMISES

- C. What other environmental permits are held by the company, relative to hazardous waste management?

NA SPDES Permit Number

NA Air Permit Number

NA Part 364 Industrial Waste Transporter Permit (indicate this company's permit number if any)

Please describe other relative (if any) permits and give the name, address, Part 364 Permit Number and EPA I.D. Number of transporter(s) used by company.

CHEMICAL POLLUTION CONTROL INC
120 SOUTH 4TH ST, NY 11706

- D. If the facility is a treatment, storage or disposal facility, have they:

NA Submitted a Part A application.

NA Have changes been made that are not reflected in the Part A application?

NA Should the Part A be modified by the Company? If so, explain.

NA Been granted a Part B application.

NA Submitted a Part 373 permit application.

NA Been granted a Part 373 permit.

If so, when does it expire: _____

Please attach or explain any special conditions or variances
- 373-1.1(e)

If so, also complete Appendix M.

- E. Describe the activities that result in the generation of hazardous waste. Include the company's manufacturing processes.

THIS FACILITY PRODUCES GALVANIZED PRODUCTS,
I.E., STEEL PRODUCTS ARE COATED WITH ZINC.
SULFURIC ACID AND CAUSTIC SODA ARE
USED AS PREPARATORY MATERIALS - SINCE FACILITY

- PROCESS TANKS ARE LEAD-LINED, LEAD LEACHES INTO THE
SULFURIC ACID AND CAUSTIC SODA, RENDERING BOTH HAZARDOUS
F. Identify the hazardous wastes that are on-site, the quantity of
each, and the storage method (use the identification numbers
referred to in Part 371).

10 CUBIC YARDS OF MATERIALS CONTAMINATED
WITH LEAD DOOR.
STORED IN AN OPEN ROLL-OFF
CONTAINER

- G. The handler notified EPA as a:

GENERATOR

Has EPA or DEC officially modified the handlers status? If so,
attach correspondence.

N/A

2. Status Identification:

This handler should be inspected as a (check each appropriate category after considering exemptions).

A. NA Transporter - complete Appendix B

B. Generator Status Identification 372.1

1. NA Category 1 - Small Quantity Generator - Conditionally Exempt - generates less than 100 kg/mo and stores less than 100 kg. - 372.1(e)(1)(vii)(a) Complete Part II, 1A.
2. NA Category 2 - Small Quantity Generator - generates less than 100 kg/mo and stores more than 100 kg but less than 1,000 kg. - 372.2(a)(8)(vi) - Complete Part II, 1B.
3. NA Category 3 - Small Quantity Generator - subject to reduced generator requirements - generates more than 100 kg/mo but less than 1,000 kg/mo and stores less than 1,000 kg. - 372.2(a)(8)(iii) - Complete Part II, 1C.
4. X Category 4 - Generator - generates and/or stores 1,000 kilograms or more per month or generated acute hazardous waste in quantities greater than those specified in Part 372.1(e)(1)(v). Complete Part II, Questions 2-7. (Generators over sole source aquifers also complete Appendix A.)

C. Treatment, Storage or Disposal Facility Status

1. Hazardous waste is generated and stored on-site. If so:
 - (a) NO Has hazardous waste been stored on-site longer than 90 days? 373-1.1(d)(1)(iii) - If yes, complete Appendix A.
 - (b) NO Has more than 8,800 gallons of hazardous waste been stored in containers? 373-1.1(d)(1)(iii)(a) - If yes, complete Appendix A.
 - (c) NO Has more than 20,000 gallons of hazardous waste been stored in tanks? 373-1.1(d)(1)(iii)(b) - If yes, complete Appendix A.
2. NO Hazardous waste is received from off-site and not beneficially used, reused or legitimately recycled or stored. If yes, complete Appendix A.

3. NO Hazardous waste is treated on-site. If yes, complete appropriate portion of this report.
4. NO Hazardous waste is disposed on on-site. If yes, complete appropriate portion of this report.

3. Exemptions

A. Generator Exemptions

- (1) NA Not a regulated handler (be sure to indicate why in Part I 1F and 1G and/or in appropriate exemption below - for example the company notified for precautionary reasons or the waste generated is not hazardous as specified in 371.1(e)(2).
- (2) NA Delisted hazardous waste. IDENTIFY the waste that was delisted: (If the company is in the delisting process they are still regulated until their delisting petition is favorably approved). Complete appropriate parts depending on company status.
-
- (3) NA Exemption for used engine lubricating oil. 372.1(e)(8)
- (4) NA Exemption for publicly owned treatment works. 372.1(e)(4)
- (5) NA Samples collected for testing. 372.1(e)(5)
- (6) NA Residues of hazardous waste in empty containers. 372.1(e)(6)
- (7) X A hazardous waste which is generated in a product or raw material storage tank, a product or raw material transport vehicle or vessel, a product or raw material pipeline, or in a manufacturing process unit or an associated non-waste treatment manufacturing unit is not subject to regulation until it exits the unit in which it was generated, unless the unit is a surface impoundment, or unless the hazardous waste remains in the unit more than 90 days after the unit ceases to be operated for manufacturing, or for storage or transportation of product or raw materials. 372.1(e)(7).

B. TSD Exemptions

1. TSD exemptions - 373-1.1(d)(1) (for facilities and operations that manage hazardous waste other than waste oil).

(a) NA Storage and recycling or recyclable materials specified in Part 373-1.1(d)(1)(vi).

(b) NA Storage of hazardous wastes specified in 373-1.1(d)(1)(vii). Must meet Part 374 requirements.

(c) NA Recycling of Hazardous Wastes 373-1.1(d)(1)(viii). Parts 373-2.2(c), 372.4(b), 372.4(d)(1) must be complied with (Storage of wastes prior to recycling is not exempt under this subparagraph)

- This exemption does not apply to commercial facilities which recycle listed hazardous wastes or hazardous waste sludges received from off-site or burn these wastes for energy recovery;

- Commercial facilities that reclaim precious metals from hazardous wastes do qualify;

- This exemption does not apply to boiler and industrial furnaces that burn hazardous wastes for energy recovery if the waste stream has a heat value of less than 8,000 BTU/lb.

(d) NA Totally enclosed treatment facility - 373-1.1(d)(1)(xi).

(e) NA Elementary neutralization units or wastewater treatment units other than units located at commercial facilities. Units utilized only to neutralize or treat hazardous waste from recycling characteristic hazardous wastes or for precious metal recovery at commercial facilities are exempt. Must meet 373-3.2, 373-3.3, 373-3.4 and storage requirements of 373-3.9, 373-3.10(k) and (l). Containers and tanks must be marked with the words "Hazardous Waste" and dated where applicable. - 373-1.1(d)(1)(xii) (Complete Appendix Q).

(f) NA The addition of absorbent material with the purpose of preparing the waste for incineration or to fill void spaces in containers intended for land disposal. If yes, complete Part II 3.D.3, 3.D.4, 3.D.9. - 373-1.1(d)(1)(xvii).

2. TSD exemptions - 373-1.1(d)(2) (for facilities and operations that manage waste oils).

- (a) NA Storage or treatment of waste oil generated on-site prior to its beneficial use or reuse or legitimate recycling or reclamation if the waste oil is not a listed hazardous waste, and the waste oil is not a hazardous sludge. 373-1.1(d)(2)(ii). If yes, complete Part II: 2D, 2E, 3C, 3D, 5, 6, 7, Appendix O (if required).
- (b) NA Exemptions for storage of waste oil at an energy recovery facility prior to its on-site combustion of such waste oils are not listed hazardous wastes, waste oils are not hazardous sludges, and the facility stored less than 80,000 gallons of waste oil. 373-1.1(d)(2)(iii). If yes, complete Part II: 2D, 2E, 3C, 3C, 5, 6, 7.
- (c) NA Combustion units that recover energy from waste oil, other than listed hazardous waste and sludges and the related treatment on-site of such combustion units. 373-1.1(d)(2)(iv).

3. TSD exemptions - (for facilities and operations that manage hazardous waste or waste oils).

- (a) NA Storage of hazardous waste generated and stored on-site for 90 days or less and 8,800 gallons or less is stored in containers or 20,000 gallons or less is stored in tanks. The facility can not be located in a geographical area overlying a sole source aquifer. If yes, complete Part II, 2B, 3. 373-1.1(d)(1)(iii).
- (b) NA Storage and treatment of hazardous waste on-site of generation if generated less than 100 kilograms and stored less than 1,000 kilograms of hazardous waste in each calendar month and not generate or store acute hazardous waste as described in 373-1.1(d)(1)(i)(b). 373-1.1(d)(1)(v).
- (c) NA Treatment or containment activities during an immediate response 373-1.1(d)(1)(xiii).
- (d) NA Accumulation areas. If yes, complete Part II: 3A. 373-1.1(d)(1)(xiv).
- (e) NA Storage of manifested shipments of hazardous waste in containers or vehicles by a transporter at its own transfer facility for 5 days or less. If yes, complete Appendix B. 373-1.1(d)(1)(xv).

Part II

Generator Inspection Section

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

1. Requirements Exempt and Small Quantity Generator (Category 1-3 Generators):

A. Category 1 - The conditionally exempt generator has:

1. ☐ made a hazardous waste determination -
372.1(e)(1)(vii)(a). NA
2. ☐ accumulated no more than 100 kg of hazardous waste
on-site - 372.1(e)(1)(vii)(b). NA
3. ☐ disposed of hazardous waste in an authorized,
permitted or licensed on-site or off-site
facility - 372.1(e)(1)(vii)(c). NA
4. ☐ ensured delivery to an off-site facility
by a transporter authorized under Part 364
or by the generator himself - 372.1(e)(1)(vii)(d). NA

B. Category 2 - The generator who generates less than 100 kg/month
and stores between 100-1000 kg has complied with the following:

General Requirement - Items 2A-E (pg. II-5)

Manifest & Reporting - Item 4A-N (pgs. II-9, 10)

1. ☐ use tanks that are properly sheltered and protected
to prevent spillage, seepage or any discharge -
372.2(a)(8)(vi)(a). NA
2. ☐ keep containers and tanks holding hazardous waste
closed during storage except to add or remove wastes.
Containers and tanks must not be opened, handled or
stored in a manner which may rupture the tank or
containers or cause them to leak. Tanks and containers
must be inspected at least quarterly for leaks or damage
- 372.2(a)(8)(vi)(b). NA
3. ☐ use tanks that are designed, constructed or operated in
accordance with whichever of the following requirements
are in effect in the municipality where the facility is
located: 372.2(a)(8)(vi)(c). NA

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X Violations

X Satisfactory
NA Not Applicable

(a) — the State Uniform Fire Protection and Building Code Title 9 (B) NYCRR, Subchapter C, including the National Fire Protection Association Flammable and Combustible Liquids Code (NFPA-30) - 372.2(a)(8)(vi)(c)(1), or NA

(b) — the applicable local building and fire codes - 372.(a)(8)(vi)(c)(2). NA

4. — the quantity of waste accumulated on-site must never exceed 1,000 kilograms - 372.2(a)(8)(vi)(d). NA

C. Category 3 - The generator subject to reduced requirements has complied with the following:

General Requirements - Complete Items 2A-E (pg. 11-5)

Manifest & Reporting - Complete Items 4A-N (pgs. 11-9, 10)

Container Requirements - Complete Item 3C,

Item 3D, questions 1-9 [except for Question 8(a)] (pgs. 11-5, 6)

Preparedness & Prevention - Complete Items 6A-F (pgs. 11-12, 13)

1. — quantity of waste on-site never exceeds 1000 kg and may be stored for up to 180 days unless the disposal facility is 200 miles or more away. Storage up to 270 days then is allowed. - 372.2(a)(8)(iii)(a). NA

2. — at all times there must be at least one employee on-site or on call with the responsibility for coordinating emergency measures - 372.2(a)(8)(iii)(e)(1). NA

3. — the name and phone number of the emergency coordinator must be posted next to the telephone - 372.2(a)(8)(iii)(e)(2)(i). NA

4. — location of fire extinguishers and spill control material and, if present, fire alarm must be posted next to the telephone - 372.(a)(8)(iii)(e)(2)(ii). NA

5. — telephone number of the fire department must be posted next to the phone unless the facility has a direct alarm - 372.2(a)(8)(iii)(e)(2)(iii). NA

6. — ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures - 372.2(a)(8)(iii)(e)(3). NA

7. — the emergency coordinator or a designee have responded applicably to any emergencies that have arisen - 372-2(a)(8)(iii)(e)(4). NA

[for storage in tanks complete the following section - 373-3.10(1)]

8. ☐ the owner or operator must take precautions to prevent accidental ignition of ignitable or reactive wastes. "No Smoking" signs must be placed wherever there is a hazard from either waste - 373-3.2(h)(1). NA
9. ☐ the treatment, storage or disposal of ignitable or reactive waste, and the mixture or commingling of incompatible waste must be conducted so that it does not:
- (a) ☐ generate extreme heat or pressure, fire or explosions or violent reactions - 373-3.2(h)(2)(i). NA
 - (b) ☐ produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health - 373-3.2(h)(2)(ii). NA
 - (c) ☐ produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion - 373-3.2(h)(2)(iii). NA
 - (d) ☐ damage the structural integrity of the device or facility containing the waste - 373-3.2(h)(2)(iv). NA
 - (e) ☐ through other like means threaten human health or the environment - 373-3.2(h)(2)(v). NA
10. ☐ hazardous wastes or treatment reagents must not be placed in a tank if they could cause the tank or its inner liner to fail - 373-3.10(1)(2)(ii). NA
11. ☐ uncovered tanks must be operated to ensure at least 60 centimeters (2 feet) of freeboard, unless there is adequate containment - 373-3.10(1)(2)(iii). NA
12. ☐ where hazardous waste is continuously fed into a tank, the tank must be equipped with a means to stop this inflow - 373-3.10(1)(2)(iv). NA
13. ☐ the owner or operator must mark all tanks with the words "Hazardous Waste" and with other words that identify the contents of the tanks. For underground tanks, the markings must be placed on a sign in the area above the tank - 373-3.10(1)(2)(v). NA

Tank(s) are inspected each operating day for:

14. ☐ discharge control equipment (e.g. waste feed cutoff systems, bypass systems and drainage systems) - 373-3.10(1)(3)(i) NA
15. ☐ monitoring equipment (e.g. pressure and temperature gauges) - 373-3.10(1)(3)(ii) NA

16. ___ level of waste in tank to ensure proper freeboard - 373-3.10(1)(3)(iii). NA

Tank(s) are inspected weekly for:

17. ___ corrosion or leaking of fixtures or seams - 373-3.10(1)(3)(iv). NA
18. ___ erosion or obvious signs of leakage (e.g. wet spots or dead vegetation) of the construction materials of, and the area immediately surrounding discharge confinement structures (e.g. dikes) - 373-3.10(1)(3)(iv). NA
19. ___ at closure all hazardous waste must be removed from tanks, discharge control equipment and discharge confinement structures - 373-3.10(1)(4). NA

Special requirements for ignitable or reactive waste:

20. ___ Ignitable or reactive waste is placed in a tank and the waste is stored, treated, rendered or mixed before or immediately after placement in the tank so that the resulting wastes, mixture or dissolution of material is no longer ignitable or reactive - 373-3.10(1)(5)(i)(a)(1). NA
21. ___ Section 373-3.2(h) is complied with - 373-3.10(1)(5)(i)(a)(2). NA
22. ___ the waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to ignite or react - 373-3.10(1)(5)(i)(b). NA
23. ___ the tank is used solely for emergencies - 373-3.10(1)(5)(i)(c). NA
24. ___ storage of ignitable or reactive waste in covered tanks complies with the National Fire Protection Association's (NFPA's) buffer zone requirements for tanks, contained in Tables 2-1 thru 2-6 of the "Flammable and Combustible Liquids Codes." - 373-3.10(1)(5)(ii). NA

Incompatible Wastes - 373-3.10(1)(5)(ii):

25. ___ Incompatible wastes, or incompatible wastes and materials must not be placed in the same tank unless 373-3.2(h)(2) is complied with - 373-3.10(1)(6)(i). NA
26. ___ Hazardous waste must not be placed in an unwashed tank which previously held an incompatible waste or material, unless section 373-3.2(h) of the Subpart is complied with - 373-3.10(1)(6)(ii). NA

X Violations

X Satisfactory
NA Not Applicable

For Category 4 generators of Hazardous Waste - complete remainder of Part II.

2. General Requirements

- A. The generator has made a determination as to whether or not his solid waste is a hazardous waste - 372.2(a)(2). X
- B. The generator has obtained an EPA identification number - 372.2(a)(3). X
- C. The generator has packaged the waste in accordance with the applicable USDOT regulations - 372.(a)(4). X
- D. The generator has labeled each package of waste in accordance with the applicable USDOT regulations - 372.2(a)(5). X
- E. The generator has marked each container or package of waste properly - 372.2(a)(6). X

3. On-site Accumulation of Hazardous Waste Prior to Shipment

- A. Accumulation areas - 372.2(a)(8)(i)(a). NA
1. The generator complies with section 373-3.9(b)-(d) [Complete Part II 3.D.3-6.] NA
2. The containers are marked with the words "Hazardous Waste" or with other words that identify the contents 372.2(a)(8)(i)(a)(2). NA
- B. All such wastes are shipped off-site to an authorized treatment, storage or disposal (TSD) facility in 90 days or less - 372.2(a)(8)(ii). NA
- C. X The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container or tank - 372.2(a)(8)(ii): 373-1.1(d)(1)(iii)(c)(2), 373-1.1(d)(1)(iv)(d).
- D. Standards for management of containers - 372.2(a)(8)(ii); 373-3.9 (This section will also be completed for TSD's as referred to from Appendix A.)

X Violations

X Satisfactory
NA Not Applicable

1. What type of containers are used for accumulation?
Describe the size, type. (e.g., 12 fifty-five gallon drums of waste acetone).

10 CUBIC YDS OPEN-TOP
ROLL-OFF

2. ☒ Each container is marked with the word "Hazardous Waste." 372.2(a)(8): 373-1.1(d)(1)(iii) (c)(3), 373-1.1(d)(1)(iv)(d).

3. ☐ The containers appear to be in good condition and are not in danger of leaking. (If containers are leaking, describe the type, condition and number that are leaking or corroded. Be detailed and specific) - 373-3.9(b).

4. ☐ Hazardous waste is stored in containers made of compatible materials - 373-3.9(c).
(If not, please explain).

5. ☒ All containers except those in use are closed - 373-3.9(d)(1).

6. ☐ Containers holding hazardous waste must not be opened, handled or stored in a manner which may rupture the container or cause it to leak - 373-3.9(d)(2).

7. ☐ The storage area is inspected at least weekly - 373-3.9(e).

8. The generator complies with the following special requirements related to storage of ignitable or reactive wastes. 373-3.9(f):

- (a) ___ Containers holding ignitable or reactive waste are located at least 15 meters (50 feet) from the facility property line - 373-3.9(f). NA
- (b) ___ Generator has taken precautions to prevent accidental ignition or reaction of ignitable or reactive waste - 373-3.2(h)(1). NA
- (c) ___ Generator has placed "No Smoking" signs conspicuously wherever there is a hazard from ignitable or reactive waste - 373-3.2(h)(1). NA

9. The generator complies with the following special requirements related to incompatible wastes: 373-3.9(g).

- (a) The treatment, storage or disposal of ignitable or reactive wastes, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials, is conducted to prevent: 373-3.2(h)(2).
- (1) ___ the generation of extreme heat or pressure, fire or explosion, or violent reaction - 373-3.2(h)(2)(i). NA
- (2) ___ production of uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to pose a risk of fire or explosions - 373-3.2(h)(2)(ii). NA
- (3) ___ production of uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions - 373-3.2(h)(2)(iii). NA
- (4) ___ damage to the structural integrity of the device or facility containing the waste - 373-3.2(h)(2)(iv). NA
- (5) ___ a threat to human health or the environment - 373-3.2(h)(2)(v). NA
- (b) ___ Incompatible wastes, or incompatible wastes and materials, are not placed in the same container - 373-3.9(g)(1). NA
- (c) ___ Hazardous waste must not be placed in an unwashed container that previously held an incompatible waste or material - 373-3.9(g)(2). NA
- (d) ___ Hazardous waste in containers stored nearby incompatible waste or material is separated from the incompatible waste by a dike, berm, wall or other device - 373-3.9(g)(3). NA

10. Special requirements for generators over sole source aquifers: 373-1.1(d)(1)(iv)

- (a) — the facility submits written notification to the regional office that they qualify for the exemption under 373-1.1(d)(1)(iv) and submit a TSD annual report - 373-1.1(d)(1)(iv)(c). NA
- (b) — the facility complies with the requirements of ECL Article 17 - 373-1.1(d)(1)(iv)(e). NA
- (c) — The container storage areas are within a secondary containment system designed and operated in accordance with the following: 373-1.1(d)(1)(iv)(f). NA
- (1) — the base under the containers must be free of cracks or gaps and sufficiently impervious to contain collected material until it is removed - 373-2.9(f)(1)(i). NA
- (2) — the base must be sloped or the containment system otherwise designed and operated to drain and remove liquid unless the containers are elevated or protected from contact with accumulated liquids - 373-2.9(f)(1)(ii). NA
- (3) — the containment system must have sufficient capacity to contain 10 percent of the volume of containers or the volume of the largest container, whichever is greater. Containers that do not contain free liquids are not considered in this determination - 373-2.9(f)(1)(iii). NA
- (4) — Run-on is prevented unless the system has sufficient excess capacity to that required in (3) - 373-2.9(f)(1)(iv). NA
- (5) — Accumulated waste and precipitation must be removed as necessary to prevent overflow 373-2.9(f)(1)(v). NA

(d) Storage areas that have containers with no free liquid do not need a containment system provided either of the following is met: 373-2.9(f)(2)

(1) the storage area is sloped or designed to drain and remove accumulated liquid - 373-2.9(f)(2)(i). NA

(2) the containers are elevated or protected from contact with accumulated liquid - 373-2.9(f)(2)(ii). NA

(e) Storage areas that contain F020-F027 with no free liquid must have a containment system as described in (c) 373-2.9(f)(3). NA

E. Standards for management of tanks: 373-3.10

1. Generators complete Appendix 0 except for Section 373-3.10(h)(3); Items 7C1-5 (pages 0-14 to 0-15). [In addition, sections 373-3.7 and 3.8 which are cross-referenced do not apply except for section 373-3.7(b) and (e)].

2. Generators over sole-source aquifers complete Appendix 0 except for Section 373-3.10(h)(3), Items 7C1-5 (pages 0-14 to 0-15). [Requirements of section 373-3.8 do not apply.]

4. Manifest Records and Reporting: 372.2(b)

A. It appears, from the available information, that there is manifest copy available for each hazardous waste shipment off-site that has been made - 372.2(b)(5)(i). X

If "violation" checked or "don't know," please elaborate.

B. Describe the approximate size of an average shipment made and how many shipments per month?

FACILITY IS SHIPPING OUT ONE TRUCK-LOAD AT A
TIME AS THEIR FINANCES PERMIT:

C. The transporter has a valid Part 364 permit or is otherwise authorized to transport the waste to the designated facility - 372.2(b)(5)(ii). X

D. Each manifest (a representative sample) has the following information: 372.2(b)(1); Appendix 30.

X Violations

X Satisfactory
NA Not Applicable

Generator Transporter 1 Transporter 2 TSD/F

1. ☐ Name of _____ ☐ ☐ ☐ ☒
2. ☐ EPA ID No. of _____ ☐ ☐ ☐ ☒
3. ☐ Mailing Address of _____ ☐ ☐ ☐ ☒
4. ☐ Telephone No. of _____ ☐ ☐ ☐ ☒
5. ☐ Manifest Document # _____ ☐ ☐ ☐ ☒
6. ☐ The proper USDOT description. _____ ☐ ☐ ☐ ☒
7. ☐ The appropriate: _____ quantity, _____ container number,
_____ container type, and _____ waste type by units of weight or
_____ volume. _____ ☒
8. ☐ Signed certification that the materials are properly
classified, described, packaged, marked and labeled,
and are in proper condition for transportation under
regulations of the USDOT and NYSDEC -
372.2(a)(4) and 372.2(a)(5) and 372.2(a)(6). _____ ☒
9. ☐ Signed copies of the manifest records have been retained
at the facility for at least three years -
372.2(c)(1)(i). _____ ☒
- E. ☐ The generator must distribute copies of the manifest
as specified on the manifest form - 372.2(b)(3). _____ ☒
- F. ☐ The generator has received signed copies (from the TSD
facility) of all manifests for wastes shipped off-site
more than 20 days ago: _____ ☒
- ☐ If not, exception reports have been submitted covering
these shipments - 372.2(c)(3) _____ ☒
- G. ☐ A generator annual report has been prepared and sent
to the Department - 372.2(c)(2). _____ ☒
- H. For international shipments the generator has done the following:
372.5.
 1. ☐ EPA and the Department have been notified 60 days prior
to shipment of hazardous waste destined for treatment,
storage or disposal outside the United States -
372.5(c)(1). _____ ☒
 2. ☐ Delivery of the wastes has been confirmed by the
consignee within 90 days of acceptance by initial
transporter - 372.5(e)(2). _____ ☒

3. Primary exporters of hazardous waste must file with the Administrator and the Department no later than March 1 of each year, a report summarizing the types, quantities, frequency, and ultimate destination of all hazardous waste exported during the previous calendar year - 372.5(b)(1). NA
- I. Has complied with interstate shipments - 372.6 X
- J. Has complied with shipments by rail or water (bulk) - 372.7 NA
- K. X Copies of all records have been kept for at least three years (e.g., annual reports, manifests, exception reports, sampling data) - 372.2(c)(1)(i), (ii), and (iii).
- L. All records required under this subdivision were furnished upon request, or made available at a reasonable time for inspection - 372.2(c)(1)(iv). X
- M. There is written communication that the designated treatment, storage or disposal facility is an authorized treatment, storage or disposal facility for the particular wastes being offered for shipment and has capacity to accept the hazardous waste set forth on the manifest and will assure the ultimate disposal method is followed - 372.2(b)(2)(i). X
- N. X There is written communication that the designated transporter is authorized to deliver the waste to the facility on the manifest - 372.2(b)(2)(ii).
5. Personnel Training - 372.2(a)(8)(ii) and 373-3.2(g)
- A. There is a:
1. X written description of the job title for each position at the facility related to hazardous waste management and name of the employee filling each job - 373-3.2(g)(4)(i)
 2. X written job description for each position - 373-3.2(g)(4)(ii)
 3. X written description of the type and amount of both introductory and continuing training that will be given to each person related to hazardous waste management - 373-3.2(g)(4)(iii)
 4. X records that document the training or job experience required has been given to and completed by facility personnel - 373-3.2(g)(4)(iv).

X Violations

X Satisfactory
NA Not Applicable

- B. X The training program is directed by a person trained in hazardous waste management procedures and must include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. 373-3.2(g)(1)(i),(ii) and (iii). The components are:
1. X Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment;
 2. X Key parameters for automated waste feed cutoff systems;
 3. X Communications or alarm systems;
 4. X Response to fires and explosions;
 5. X Response to groundwater contamination incidents; and
 6. X Shutdown of operations.
- C. X Facility personnel have successfully completed the program by the effective date of these regulations or six months after the date of their employment. 373-3.2(g)(2).
- D. X Facility personnel have taken part in an annual review of the initial training required - 373-3.2(g)(3).
- E. X Training records on current personnel have been kept permanently at the facility (until closure) - 373-3.2(g)(5).
- F. X Training records on former employees have been kept for at least three years from the date the employee last worked at a facility - 373-3.2(g)(5).

6. Preparedness and Prevention - 372.2(a)(8)(ii); 373-3.3

A. X The facility is maintained and operated to minimize the possibility of a fire or explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water - 373-3.3(b).

The facility must be equipped with the following (Check missing equipment if needed in this facility's particular operations.) - 373-3.3(c):

FACILITY IS
IN PROCESS OF
REPLACING ALL
LEAKING TANKS.
NYC DEP TEST
RESULTS INDICATE
NON-SUDDEN RELEASE
TO SURROUNDING
SOIL.

X VIOLATIONS

X Satisfactory
NA Not Applicable

1. ☐ An internal communication or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel; X
2. ☐ A device, such as a telephone or a hand-held, two-way radio capable of summoning emergency assistance from local police departments, fire departments or state or local emergency response teams; X
3. ☐ Portable fire extinguishers, fire control equipment; X
4. ☐ Water at adequate volume and pressure to supply water hose streams, or foam-producing equipment, or automatic sprinklers, or water spray systems. X
- C. ☐ Facility communications or alarm systems, fire protection equipment, and spill control equipment are tested and maintained as necessary to assure their proper operation in time of emergency - 373-3.3(d). X
- D. ☐ Personnel involved in hazardous waste operations have immediate access to an internal alarm or emergency communication device - 373-3.3(e). X
- E. X The facility has the required aisle space - 373-3.3(f) (Inspections should be able to be made of each drum and space should be sufficient to fight a fire). X

ROLL-OFF COULD NOT
BE PROPERLY
INSPECTED DUE
TO PILE-UP OF
WASTES/MATERIALS
IN SURROUNDING
AREAS

The facility owner or operator has made an attempt in good faith to make the following arrangements with local authorities, as appropriate for the type of waste handled at the facility and the potential need for the services of these organizations - 373-3.3(g)(1):

1. X Arrangements to familiarize police, fire departments and emergency response teams with the functions and layout of the facility; —
2. X Where more than one police and fire department might respond to an emergency, an agreement designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to primary emergency authority; NA
3. X Agreements with government emergency response teams, emergency response contractors, and equipment suppliers; —

X Violations

X Satisfactory
NA Not Applicable

4. ☒ Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illness which could result from fires, explosions or releases at the facility; and

5. ☐ Where state or local authorities decline to enter into such arrangements, the owner or operator has documented the refusal in the operating record.

NA

7. Contingency Plan and Emergency Procedures - 372.2(a)(8)(ii); 373-3.4

A. ☒ The facility has a contingency plan or some other emergency plan which incorporates hazardous waste management.

B. The following are included in the contingency plan - 373-3.4(c):

1. ☒ A description of actions facility personnel must take in response to fires, explosions or any unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil or surface water;

2. ☒ A description of arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services;

3. ☒ Names, addresses and phone numbers of all persons qualified to act as emergency coordinator;

4. ☒ A list of all emergency equipment at the facility, and decontamination equipment, where this equipment is required;

5. ☒ The location and the physical description of each item on the list, and a brief outline of its capabilities;

X Violations

X Satisfactory
NA Not Applicable

6. X An evacuation plan for facility personnel, where there is a possibility that evacuation could be necessary. _____
- C. X Copies of the contingency plan are maintained at the facility. 373-3.4(d)(1) _____
- D. X Copies of the contingency plan have been submitted to all local police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services. 373-3.4(d)(2) _____
- E. _____ The contingency plan has been amended. 373-3.4(e) NA
- F. _____ There was at least one employee either on the facility premises or on call with the responsibility for coordinating all emergency response measures - 373-3.4(f) X
- G. _____ During a past emergency situation the emergency coordinator (or his designee when the emergency coordinator is not on call) immediately activated emergency procedures - 373-3.4(g). NA

The following was done:

1. _____ Activated internal facility alarms or communication systems; NA
2. _____ Notified appropriate state or local agencies; NA
3. _____ Immediately identified the character, exact source, amount and a real extent of any released materials; NA
4. _____ The emergency coordinator assessed possible hazards to human health and the environment; NA
5. _____ The emergency coordinator, after determining that that facility had a release, fire or explosion which could threaten human health or the environment outside the facility, reported his findings; NA
6. _____ During the emergency, the emergency coordinator took all reasonable measures necessary to ensure that fire, explosions and releases do not occur, recur or spread to other hazardous waste; NA

7. — The emergency coordinator monitored for leaks, pressure buildup, gas generation or ruptures in valves, pipes or other equipment, where appropriate during the facility's response to the emergency; NA
8. — The emergency coordinator provided for treating, storing or disposing of recovered waste, contaminated soil or surface water, or any other material that resulted from a release, fire or explosion at the facility; NA
9. — The emergency coordinator ensured that in the affected area no waste that may be incompatible with the released material was treated, stored or disposed of prior to cleanup procedures being completed; NA
10. — The emergency coordinator ensured that all emergency equipment listed in the contingency plan was cleaned and fitted for its intended use before operations were resumed; NA
11. — The owner or operator notified the Commissioner that the facility is in compliance with Part 373-3.4(g)(8) before operations were resumed in the affected areas of the facility; NA
12. — The owner or operator noted in the operating record the time, date and details of the incident that required implementation of the contingency plan; NA
13. — The owner or operator submitted a complete written report on the incident within 15 days after the incident occurred. NA